

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA  
*ex rel.* AIDAN FORSYTH,

*Plaintiff,*

V.

THE HERB CHAMBERS COMPANIES, et al.,

*Defendants.*

No. 24-CV-11177-PBS

## JOINT STIPULATION OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and the qui tam provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the settlement agreement executed on April 9, 2025 (“Settlement Agreement”), the United States and the relator, Aidan Forsyth, hereby jointly stipulate to the entry of an order dismissing this matter as follows:

1. As to the Covered Conduct, as that term is defined in Recital Paragraph J of the Settlement Agreement, this matter is dismissed with prejudice; and
2. As to any other allegations in the complaint, this matter is dismissed with prejudice as to the relator, but without prejudice as to the United States.

By agreement of the settling parties, this Court shall retain jurisdiction and venue for any dispute relating to the Settlement Agreement.

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

Dated: April 21, 2025

By: /s/ Alexandra Brazier  
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**LOCAL RULE 7.1 CERTIFICATION**

The undersigned counsel certifies, pursuant to Local Rule 7.1(a)(2), that counsel for the United States has conferred with counsel for the relator, and the relator joins in the filing of this stipulation of dismissal.

Dated: April 21, 2025

By: /s/ Alexandra Brazier  
Alexandra Brazier  
Assistant United States Attorney